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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

WELLS FARGO FORBEARANCE
LITIGATION

No. 3:20-cv-06009-JD

**STIPULATION AND [PROPOSED]
ORDER TO STAY CASE**

Pursuant to Civil L.R. 7-12, Defendants Wells Fargo Bank, N.A. and Wells Fargo & Co. (together, “Wells Fargo”) and Plaintiffs Luis and Marisol Castro, Pamela Delpapa, Jenna Doctor, Gerald Forsburg, Samara Green, Patrick Healy, Brett Jacob, Charles Johnson, Barbara Prado, and Renrick and Vivian Robinson (collectively, “Plaintiffs,” and with Wells Fargo, the “Parties”), through their respective counsel, stipulate and respectfully request a stay of all proceedings in this case pending the Parties’ continued efforts towards settlement of this action as follows:

WHEREAS, Defendants’ Motion to Dismiss Fourth Amended Consolidated Class Action Complaint (Dkt. No. 197) has been fully briefed and is set for oral argument August 10, 2023; and

WHEREAS, the Parties have scheduled mediation sessions with The Honorable Layn Phillips (Ret.) for October 3 and 24, 2023; and

WHEREAS, the Parties believe that the need to continue focusing on settlement efforts constitutes good cause for a stay of this proceeding; and

WHEREAS, no party will be harmed by the issuance of a stay;

WHEREAS, other than the August 10, 2023, hearing, no other Court-imposed deadlines will be impacted by the proposed stay;

NOW, THEREFORE, THE PARTIES STIPULATE as follows:

The proceedings in this matter shall be stayed until November 30 2023, for the purpose of enabling the Parties to continue preparing for and engaging in mediation sessions scheduled for October 3 and 24, 2023.

The August 10, 2023 hearing set for oral argument on Defendants' Motion to Dismiss Fourth Amended Consolidated Class Action Complaint shall be vacated and, if necessary, should be re-noticed by Wells Fargo following the conclusion of the stay period.

The Parties shall file a joint status report no later than November 15, 2023.

IT IS SO STIPULATED.

DATED this 31st day of July, 2023.

KELLER ROHRBACK L.L.P.

TROUTMAN PEPPER
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s/ Gretchen Freeman Cappio

/s/ Amy P. Williams

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SIGNATURE AUTHORIZATION

Pursuant to Local Rule 5-1(i), I hereby certify that the contents of this document are acceptable to the counsel signing above and that I have obtained counsel's authorization to affix his/her electronic signature to this document.

KELLER ROHRBACK L.L.P.

s/ Gretchen Freeman Cappio
Gretchen Freeman Cappio (*Pro Hac Vice*)
Attorneys for Plaintiff

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

Proceedings in this matter are stayed until November 30, 2023 for the purpose of enabling the Parties to continue preparing for and engaging in mediation scheduled for October 3 and 24, 2023. The motion hearing set for August 10, 2023 is vacated, and, if necessary, shall be re-noticed by Wells Fargo following the conclusion of the stay period.

IT IS FURTHER ORDERED that the Parties shall file a joint status report no later than November 15, 2023.

DATED: _____

The Honorable James Donato
UNITED STATES DISTRICT COURT JUDGE